

11/16/06-00636

Staszak, Janna/VBO

From: Doran, Karen [kmdoran@deq.virginia.gov]
Sent: Thursday, November 16, 2006 1:25 PM
To: Henderson, Kimberly/VBO; agnes.sullivan@navy.mil; Staszak, Janna/VBO; barber.joshua@epamail.epa.gov
Subject: Site 5 EE/CA - VDEQ comments
Attachments: ARARs comments - Site 5 EE-CA.doc

Hi team!

Our ARARs coordinator (Erica Dameron), our risk assessor (Pat McMurray), and I have reviewed the referenced report and submit VDEQ comments.

1. In the calculation of human health risk-based cleanup goals a TCR of 10^{-4} for Arsenic was used - please explain.
2. On Figure 2-5 removal outlines intersect several soil sample locations (i.e. SJS05-SS36 and SJS05-SS47). It is unclear if these locations will be included in the removal. Please include which of these border sample locations will be included in the removal.
3. Residential risk is usually calculated for an area based on 0.5 acre parcels. Please explain how this is incorporated into the risk-based cleanup goal development.
4. Discuss how site-wide averaging for ecological risk is protective of invertebrates with a localized life-span habitat.
5. Include additional detailed discussion on dewatering process (i.e. how will water be handled, tested, released - will there be a pad constructed, if so, how will the pad be disposed of?).
6. Include additional discussion on specific erosion and sediment controls.
7. As shown in Figure 4-1, only five test pits are outside of the removal area boundary - discuss how the waste area is defined without additional test pitting outside of the removal boundary.

Please find attached two additional comments submitted by our ARARs coordinator. Thank you for the opportunity to comment.

Karen M. Doran
Remedial Project Manager
Federal Facilities Program
Department of Environmental Quality
629 East Main Street
Richmond, VA 23219
phone - 804.698.4594
fax - 804.698.4234
kmdoran@deq.virginia.gov

11/21/2006